

Sacramento County Agricultural Commissioner
Pesticide Use Enforcement
Program Planning & Evaluation Guidance
Fiscal Year 2006 – 2007

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A. Resources

- Deputy – 75% of time in PUE
- New Deputy in the Galt office to provide more oversight in rural PUE program – estimate will spend approximately 50% of time in PUE (this will take the place of our Galt area inspector for this year so we will be reduced to 2 rural geographically assigned inspectors)
- Agricultural/Standards Inspectors
 - 3 rural geographically assigned inspectors
 - North area inspector (helps with coverage in South area) – 60% of time in PUE
 - Walnut Grove inspector – 60% of time in PUE
 - 4 urban geographically assigned inspectors
 - Downtown area inspector – 20% of time in PUE
 - Arden/Carmichael area inspector – 70% of time in PUE
 - Citrus Hts/Orangevale area inspector – 70% of time in PUE
 - Elk Grove/Folsom area inspector – 80% of time in PUE
 - *South Sac/Rancho Cordova area inspector – 60% of time in PUE
- *This position is currently vacant & should be filled in late Nov/early Dec
- Sacramento currently has 3 computers with GIS capabilities – 1 in the main office, 1 in the Galt field office, and 1 in the Walnut Grove field office

B. Restricted Material Permitting

Permit Evaluation

Current Permit Issuance Practices

- Approximately 425 ag production permits issued annually
- Approximately 80 non-ag permits issued annually
- Approximately 1200 ag production NOIs reviewed annually
- Approximately 164 non-production ag NOIs reviewed annually
- All permits are issued by licensed staff only
- All NOIs are reviewed by licensed staff only
- The majority of the non-ag permits are issued from the main Sacramento office by appointment
- The ag production permits are issued both in the field or from the field offices depending on the situation and the biologists' knowledge of the site
- Permits issued in the main office are issued directly from the computer using RMPP
- Maps used for permit issuance are primarily aerial photography from our GIS program
- Permits issued in the field and field offices are most often issued on handwritten forms and then later entered into RMPP
- Licensed staff administer private applicator certification exam on an individual basis

- Permits for restricted materials are issued to the operator of the property to be treated for ag permits or to licensed registered pest control businesses for urban non-ag permits. The permits are signed by the permittee or an authorized representative (3 CCR Section 6420). When signed by an authorized representative, written documentation of that authorization is required.
- Permittees agree that they have considered feasible, reasonable, and effective mitigation measures when using pesticides that require permits.
- All ag permits are site specific and maps are required.
- Permits issued to pest control businesses or other non-ag entities are not necessarily site specific.
- All restricted materials permits expire no later than the end of the calendar year in which they become valid.
- Sacramento County does not issue any multi-year restricted materials permits.
- Permits are signed and dated by the issuing licensed biologist.
- Permit conditions are issued at the time of permit issuance and in most cases are either pesticide specific and or site specific.
- Permits are generally only issued to licensed or certified individuals. In cases where the permittee is not licensed or certified, the restricted material permit is conditioned so that the material may only be applied by a licensed, registered pest control business.
- Sacramento County uses a computer software geographic information system (GIS) to help evaluate environmental concerns for sites identified on permits.
- A permit or NOI is denied or conditioned recognizing and utilizing appropriate mitigation measures.
- Appropriate mitigation measures considered include but are not limited to: knowledge of local conditions, pest management guidelines, restricted material hazards, pesticide information series, locally developed permit conditions, laws and regulations, nearby high hazards (to both human exposure and damage to environment or other non-target sites).

Strengths

- Permit conditions are specific and address site specific issues and hazards
- Current maps are much improved using the GIS software
- Requests for permits are generally reviewed and issued or denied within 24 to 48 hours of request by grower or pest control business
- Staff experience and knowledge of local conditions helps to reduce substantial adverse environmental impacts
- Staff generally has good working relationship with regulated industry and therefore compliance is good

Areas That Need Improving

- Current computer program is slow in field offices and does not have direct GIS interface
- Issuance of good GIS maps is slow
- Some permits include pesticides that have not been used in many years but are kept on the permit for potential future use

Goal

- Sacramento County's goal is to provide the best service available to permit applicants while providing a comprehensive and thorough evaluation of the situation and making informed and well thought out decisions when determining when, where or if restricted materials should be used. The goal is prevention or control of pests with protection of people, animals and the surrounding environment.
- Improvement in several areas could make this goal more easily attainable. These areas include updated GIS software, faster computers and printers, and more staff to make service more timely.

Deliverables

- We are currently short one staff member that functions almost exclusively in pesticide enforcement – That position should be filled shortly and training of the new biologist can commence.
- We are planning on upgrading the software that we currently use to issue permits and update GIS maps to the AgGIS program offered by Pat Way. This will allow us to keep our GIS information updated at the same time that we issue permits and will greatly reduce the time required to keep the GIS database current (which it currently is not) – We are waiting for the new version of Pat's program to be released but plan on switching to that program as soon as it is available.
- We will be replacing several of the computers currently in use by PUE staff with faster computers so that permit issuance (particularly maps) will be faster and smoother. – This equipment will be ordered when the new fiscal year begins.
- During permit issuance, remove pesticides not used in the last 5 years (question permittee regarding when each pesticide was last used in their operation)

Measures of Success

- During FY 2006/2007 perform a QC review of all permit files for completeness and accuracy of permit information, maps with surroundings identified, appropriateness of permit conditions and elimination of pesticides not used recently
- % of permits issued to standard is measure of success

Site-Monitoring Plan

Current Site Monitoring Practices

- There were 2906 sites on the restricted materials permits issued in 2005
- Permittees are required to file a Notice of Intent (NOI) at least 24 hours prior to start of application of a restricted material in Sacramento County.

- NOIs may be submitted by phone (a recorded line), fax, mail, or in person.
- NOIs are monitored between 7 am – 4:30 pm Mondays – Fridays.
- After normal office hours, NOIs are not picked up or monitored by staff.
- A log of received NOIs is maintained at the main office and at both field offices (Galt & Walnut Grove).
- The NOI requirement may be waived by our office in the case of urban pest control businesses that make large numbers of applications every month and have a good compliance record. This waiver is only granted after a minimum of an annual application inspection indicates no non-compliances.
- A NOI with less than 24 prior notice may be approved when the commissioner (or a licensed biologist) determines, due to the nature of the commodity or pest problem, effective control cannot be obtained without immediate treatment or it is determined 24 hours are not necessary to adequately evaluate the intended application. The 24 hour waiver determination is noted on the NOI log.
- Permits are evaluated to determine if an adverse environmental impact or health hazard may result, at the time of issuance and when a notice of intent is received.
- Licensed staff monitors ag production permits by performing pre-application inspections as required by 3CCR Section 6436.
- A minimum of 5% of the sites for which restricted materials are permitted will have pre-application inspections performed on them when NOIs indicate that restricted material application is imminent.
- This monitoring includes a review of the written recommendation if there is one for the application.
- Priority for performing these inspections include but are not limited to: toxicity of the pesticide to be applied (Category I being the highest priority), proximity to high hazard areas (such as schools, homes, farm labor camps, or ag-urban interface), environmental concerns (endangered species, groundwater protection), proximity to sensitive crops, areas that have been problems in previous years, Section 18 registrations, etc.
- All non-production ag permit holders are subject to application inspections every year (as much as is practicable).
- Permit holders with a history of non-compliance are monitored more frequently if possible.
- Inspections are entered in a pesticide use enforcement database to make it easier to track which permit holders are due for inspection. The hard copies of the inspections are filed in the individual's permit file.
- All non-compliances noted on any inspection forms are entered into the database and addressed as later noted in the Enforcement Response.

Strengths

- NOI logs are accurate records of planned applications and allow for planning and prioritization of preapplication inspections
- In FY 05/06 we did 120 preapplication inspections, almost 9% of the NOIs received – well above the required 5%
- 2 rural staff members have many years of experience and extensive knowledge of local cropping and conditions

Areas That Need Improving

- NOIs submitted late on Friday and on weekends, may not get reviewed until application has already occurred
- One rural staff member is new to that position and does not have extensive knowledge of local cropping and conditions

Goal

- Sacramento County's goal is a commitment to implement measures that ensure a site-monitoring plan that takes into consideration pesticide hazards such as toxicity, formulation, volatility, proximity to sensitive crops, proximity to high hazards (homes, schools, farm labor camps, ag-urban interfaces etc.), proximity to environmentally sensitive sites, groundwater protection issues, local conditions cropping and fieldwork patterns, and compliance histories of the parties involved in pesticide use.

Deliverables

- Review all NOIs to ensure:
 - A valid RMP exists for the application and site
 - Pesticide is appropriate for the pest to be controlled
 - Surrounding areas will not be adversely affected by application
 - No high hazard situation exists
 - Crop, site, rate, dilution, and method of application are label compliant
- All NOIs are reviewed and approved or disapproved by licensed staff during normal office hours
- NOIs that are denied will be documented on NOI denial form and indicated on the PRAMR
- Strive to monitor 7% of the agricultural production NOIs received with pre-application site inspections
- Rice monitoring program
 - Conduct and document 70 water hold inspections to assure that no illegal releases occur (This is a decrease from last year's workplan due to a decrease in rice acreage.)
 - Monitor rice pesticide applications to ensure compliance with worker safety, buffer zone requirements and permit conditions
 - Work cooperatively with other Sac Valley rice producing counties to ensure consistency in program
 - Prepare and deliver rice program reports at end of growing season to help evaluate the current year and make plans for the following year
- Agriculture/urban pesticide applications
 - Monitor agricultural applications to ensure safety to workers, the public, the environment, and non-target properties, particularly in high sensitivity areas such as ag-urban interface situations.
- Groundwater Protection Areas
 - Ensure when issuing permits that GWP materials are not issued in GWPA or that permittee can meet all GWPA conditions

- Monitor applications in GWPA to ensure that regulated materials are not applied or are only applied when permit conditions are met
- Address problem areas with timely follow-up inspections and training when indicated
- Continued training for staff that is new to this area

Measures of Success

- Continued monitoring of more than 5% of NOIs received
- The measure of success will be the ongoing evaluation of our site –monitoring plan for problems associated with restricted material use.
- Complaints and investigations will indicate a possible need for revision to our plan. In such cases or if indicated by our DPR EBL, we will assess and amend our site-monitoring plan as needed. This may include focusing on different pesticides, cropping situations, newly indicated sensitive areas, or other environmental concerns. We will document any changes to the plan when and if they are needed.

C. Compliance Monitoring

Comprehensive Inspection Plan

Current Inspection Program

- 41% of our inspections are scheduled
- These are primarily headquarters and records inspections for our growers, pest control businesses, government agencies, and other licensees.
- Most of these inspections are scheduled because we have found this to be most efficient and that in general the number of non-compliances revealed during these inspections is not affected by whether they are scheduled or unannounced.
- The exception would be in the case of a complaint, in which case the inspection would always be unannounced.
- Targeted inspections comprise another 43% of our inspections.
- These inspections are prioritized by chemical hazard, environmental concerns, historical applications that have shown problems, and applicator compliance history.
- The remaining 16% of our inspections are more random and focus on general applications.
- We are currently field testing the AIRS program for feasibility
- Analysis of our inspection activities during the 05/06 fiscal year shows that out of 12,016 items inspected, there were 242 items out of compliance or 2.0% of all items inspected were not in compliance. (This represents a decrease in non-compliance from 03/04 which was 2.4%)
 - 1.65% of the items inspected during pesticide use monitoring inspections were not in compliance. (1.9% non-compliance in 03/04)
 - 2.3% of the items inspected during pest control records inspections were not in compliance (2.3% non-compliance in 03/04)

- 2.0% of the items inspected during structural pest control inspections were not in compliance. (3.3% non-compliance in 03/04)

Comparisons of pesticide applications by pest control businesses and property operators show that 1.1% of items inspected for property operators were not in compliance (compared to 2.2% in 03/04) whereas 3.0% of items inspected for pest control businesses were not in compliance (compared to 3.1% in 03/04). In the area of headquarter inspections, growers show that .63% of items inspected were not in compliance (compared to 1% in 03/04) and pest control businesses show that 3.2% of items inspected were not in compliance (compared to 2.2% in 03/04). Other headquarter inspections, such as government agencies, golf courses, etc. show that 1.9% of the items inspected were not in compliance (compared to 2.8% in 03/04).

Strengths

- An effective targeted inspection plan utilizing the following components:
 - Implementation of a comprehensive GIS site mapping program
 - An up to date non-compliance tracking database
 - Documented NOI tracking in each of the offices with Natomas area NOIs being called out to the field inspector
- Enforcement districts are assigned to inspectors which allows them to become intimately familiar with pesticide usage and cropping patterns in those areas.
- Increased compliance monitoring activities at sites near areas identified to be environmentally sensitive such as schools, daycare centers and wildlife areas.
- A scheduled inspection process that is effectively identifying non-compliances during headquarter and record inspections.
- A scheduled inspection process that allows for annual contact with structural operators that otherwise would not have regular personal contact with this office.

Areas That Need Improving

- Frequency of grower headquarter inspections needs to be increased to every other year for those with employees that handle pesticides and every third year for the remaining growers.
- Frequency of deputy involvement in staff inspection activities should be increased.
- We are still working on becoming more uniform in our enforcement implementation throughout the county – both urban and rural areas.

Goal

Sacramento County's goal is to implement a comprehensive compliance inspection plan, based on the findings of the evaluation above, to ensure pesticide uses are adequately monitored throughout the county.

Deliverables

- Continue updating records to show which growers have employees that handle pesticides and increase their headquarter inspection frequency to every other year and try to increase their pesticide use monitoring inspections to annually.
- When multiple worker safety violations are discovered during application inspection activities, a follow-up headquarters inspection will be performed where feasible. If the grower is headquartered in another county, that county will be notified of the problem and a headquarter inspection will be requested.
- Deputies will perform quarterly “oversight inspections” for each pesticide use enforcement inspector during the fiscal year 06/07.
- Continued and increased field testing of the AIRS program
- Based on our inspection program evaluation, the following inspection goals have been determined for fiscal year 2006/07:

○ Pesticide Use Monitoring Inspections	Goal	Change
Pre application Inspections	7%	
Application inspections		
Property Operators	40	-10
Pest Control Businesses	70	
Field Fumigations	8	
Commodity Fumigations	15	
Field Worker Safety	5	
Mix Load		
Property Operators	16	+1
Pest Control Businesses	15	+5
Rice Water Holding Inspections	70	-90
• Pest Control Records Inspections		
Business Records Inspections	80	+15
HQ/Employee Safety – Business	80	+15
Dealer Records Inspections	7	
Adviser Records Inspections	12	-8
HQ/Employee Safety – Production Ag.	35	+5
HQ/Employee Safety – Other	80	+11
• Structural Pest Control Inspections		
Structural Application Inspections		
Branch 1 Fumigation	20	
Branch 2	40	+10
Branch 3	5	
Mix Load		
Branch 2	2	
Branch 3	2	
HQ/Employee Safety - Structural	85	+1
Structural Business Records	85	+1

- Sacramento County is currently short one pesticide use enforcement inspector but that position should be filled by some time in November 2006. We are hiring at the Inspector I level so there will be a learning curve that will result in some loss of pesticide use enforcement manpower for the 2006/2007 fiscal year but we do not anticipate that it will hinder us greatly from trying to achieve the deliverables listed above.
- Targeted surveillance activities will be carried out during the rice pesticide program as in past years.
- The inspector assigned to the rice area is helping with coverage in the Delta so we will most likely train another inspector to help with surveillance in the rice growing area.
- We will also perform targeted surveillance when needed as determined by environmental concerns and applicator compliance history. Targeted inspections will be used to most efficiently focus manpower on areas of the enforcement program to improve compliance within the county.
- The pesticide deputy will completely review all inspection reports and activities of the enforcement personnel.
- As in previous years, all non-compliances will be tracked and followed up on as required.
- The Deputy will accompany enforcement staff during inspection activities throughout the year and perform "oversight inspections" to assess activities in the field and make changes as warranted to ensure an effective program.

Measures of Success

- Throughout the year monitor incoming inspections to see that we are on track to achieve our goals in inspection areas.
- Measure % non-compliance and compare to previous years. Pay particular attention to established companies, growers and agencies as to decreasing the % of non-compliance.
- The goal of a comprehensive inspection plan is to increase compliance. A decrease in the percentage of non-compliances noted can be an indicator of success if all other things are equal.
- Further refinement of focused and targeted inspection schemes may in the short term, increase the number of non-compliances identified but in the long run, if successful, these should lead to a decrease in non-compliances.
- Periodic review by Deputy with input from our DPR EBL will help in analyzing our measure of success in this program.

Investigation Response and Reporting Improvement

Current Investigation Program

- 13 Doctors First Reports received from DPR in 2005/2006 and investigated
- Most were completed and submitted to DPR in less than 90 days

- 2 antimicrobials were completed & submitted between 90-120 days of receipt
- 1 antimicrobial was completed within 90 days but inadvertently not submitted to DPR until 180 days after receipt
- No investigation reports were returned to Sacramento County for further information or lack of documentation indicating that the quality and completeness of all investigations was satisfactory to DPR.

Strengths

- Most investigations are performed by our primary investigator who is very experienced and has excellent writing skills. She is also fluent in Spanish making many interviews more accurate and easier to perform.
- The primary investigator has some laboratory and medical background which is beneficial in the number of antimicrobial investigations that we perform.
- A log is maintained of pesticide illness investigations that indicates their status and if they result in any enforcement action.
- The follow-up on investigations that reveal non-compliances or workplace problems is good in that uneducated employers are given information that will help them come into compliance and those that are knowledgeable or in which the non-compliance contributed to the pesticide illness receive either a compliance or enforcement action appropriate to the situation.
- New complaint form was developed and put into use this past year so complaints should be easier to track and report on Report 5

Areas That Need Improving

- Need to train at least two backup investigators for pesticide illness investigations
- Although investigations are often completed in a timely manner, they are sometimes not submitted to DPR as soon as they should be

Goal

- Sacramento County's goal is to do a thorough unbiased investigation in a timely manner of every pesticide episode and to address and document all complaints received. It is our further goal to provide information and or training that will help prevent future pesticide episodes and compliance/enforcement actions that will encourage compliance with pesticide laws and regulations.

Deliverables

- Timely initiation and completion of all priority and non-priority investigations
 - Initiate priority investigations within 2 working days of receipt at CAC

- Submit preliminary update on priority investigations to DPR within 15 days
- Complete and submit all investigation reports within 120 days of receipt at CAC or if not possible due to extenuating circumstances, submit extension form explaining delay
- Keep DPR EBL apprised of any delays in investigations
- Keep staff trained in proper report writing techniques even if they are not the primary investigator
- Use and follow procedures in the Pesticide Episode Investigation Procedures Manual
- Maintain a pesticide illness investigation log that indicates:
 - Name of affected person
 - Employer if applicable
 - Type of exposure (agricultural, structural, antimicrobial, not pesticide)
 - Action taken (i.e. ACP, NOV, WL, Info sent, etc.)
 - Date report received
 - Date assigned to investigator
 - Investigator
 - Date reviewed by PUE deputy
 - Date submitted to DPR
 - Initials of DPR employee receiving investigation report
- Submit investigations that are complete and thorough and that contain adequate evidence if needed for appropriate enforcement action

Measures of Success

- Completion and submission of all priority investigations within 60 days of notification of Sacramento County Agricultural Commissioner's Office.
- Completion and submission of all other investigations within 120 days.
- The number of returned or incomplete investigations will also show a direct correlation to the success of this program.

D. Enforcement Response

Enforcement Response Evaluation

Current Enforcement Response Practices

- Inspections and investigations (pesticide illness investigations & complaints) are reviewed by the Deputy.
- Those that indicate a non-compliance are set aside for the next PUE staff meeting.
- PUE staff meetings (for Sacramento based PUE staff) are held approximately every two weeks and at these meetings issues related to PUE staff are reviewed as well as any non-compliances that have not previously been reviewed.
- At the staff meeting copies of the inspection or investigation are given to the Inspector as well as a "rap" sheet for the company or grower showing

their past action history. The non-compliance is reviewed by the Inspector and the Deputy with input from the other Inspectors.

- The violation class is determined by the Deputy with input from the Inspectors.
- The ERP is used to determine appropriate response.
- The decision of level of action to take within the ERP is determined by the Deputy with input from the Inspectors. With problematic situations, the Chief Deputy and Commissioner are also consulted.
- During the PUE staff meeting, the investigation or inspection is reviewed to ensure that adequate evidence is present to prove any cited violations.
- If the evidence is inadequate to prove the violation, the case is returned to the Inspector for further investigation or if inadequate evidence is available, the case is returned to the Inspector to write a justification as to why we are not taking any type of enforcement response relating to the non-compliance.
- All non-compliances are addressed and whatever action or inaction response is documented.
- Actions, whether they are compliance or enforcement actions, are written by the Inspectors.
- Actions are then reviewed by the Deputy, Chief Deputy, and signed by the Commissioner.
- Compliance and enforcement actions are completed and turned in to the Deputy for review prior to the next PUE staff meeting (approximately 2 weeks).
- In most cases, actions are delivered to the respondent within 30 days of the inspection or completion of investigation.
- Support staff is responsible for maintaining a log of all compliance and enforcement actions: status, certified mailing, etc.
- This action log is reviewed by the Deputy every month when preparing PRAMAR.

Strengths

- When properly followed (and not interrupted by other office emergencies), these practices result in a timely response to non-compliances.
- Use of PUE inspectors when deciding actions helps to get all the mitigating factors out on the table prior to taking an action and also results in more even and consistent enforcement.
- Review of evidence at the PUE staff meetings & returning those with inadequate evidence, helps inspectors to understand what level of evidence is needed to prove a non-compliance and leads to more complete future inspections or investigations.
- Documentation of review of all non-compliances is desirable if our program is ever monitored by the public and also during oversight of our program by DPR.

Areas That Need Improving

- Sometimes non-compliances that are brought to light through some means other than inspection or investigation do not get addressed in a timely manner.
- PUE staff meetings do not include rural based PUE staff (due to travel time and time constraints) and therefore they are not in the communication loop as well as Sacramento staff and they do not have the same access to the big picture of the Sacramento PUE program

Goal

- The goal of the enforcement response plan summarized above is to provide a swift and fair response to non-compliances that results in future compliance by the respondent. The actions must be consistent and fair in order to maintain the respect of the regulated industry as well as maintaining the integrity of this office.

Deliverables

- Consideration of all appropriate enforcement options
 - Application of the Enforcement Response Policy (Regulations)
 - Use of Citable Sections as resource
 - Application of the Fine Guidelines
- Timely response
 - Set PUE staff meetings on regular schedule
 - Oversee support staff to be sure actions are sent out immediately upon signature of the Commissioner
- Steps County undertakes to follow through on pending action
 - At beginning of each meeting review actions approved at last meeting to see that all have been completed and submitted to Deputy for review
 - Deputy maintains copy of any outstanding non-compliances to ensure the actions are completed in a timely manner.
- Schedule or Milestones
 - Day 1 - Inspection or investigation completion with evidence of non-compliance
 - Day 2 – Turn in to Deputy for review and entry into computer
 - Day 2 – 14 – Inspection reviewed by Deputy, entered into computer, if non-compliances noted “rap” sheet is generated and copies are made for the PUE staff meeting
 - Day <15 – PUE meeting held where non-compliance is reviewed and action decision is made, returned to inspector for action
 - Day 15 – 29 – Action written and submitted to Deputy for review – if compliance action, it is then forwarded to support staff for mailing – if enforcement action, it is then forwarded to Chief Deputy for secondary review
 - Day <31 – Action passed on to Commissioner for signature and then to support staff for mailing

- All actions that involve rural respondents will be reviewed prior to issuance by the rural inspector and the deputy responsible for the rural areas

Measure Success

- The best measure of success of the enforcement response program is the resulting compliance record of those entities that have been affected by the program.
- We will monitor the compliance history of those companies that have been on the receiving end of our enforcement response program to see if their compliance has indeed increased. There should also be an improvement in the compliance of other entities that have not been directly affected by our enforcement response program just through word-of-mouth but that would be difficult if not impossible to measure in many cases.
An example would be the timeliness of Pesticide Use Report (PUR) submissions. When we adopted a vigorous enforcement response program for late submission, the timeliness of PUR submission increased dramatically over a year long period.
- Actions to respondent within 30 days of completion of inspection/investigation
- No actions returned by DPR for incorrect classification or corrections

E. Special Projects

Statewide Management of AIRS Project

- Work with DPR, CACASA, and Statewide Soft to develop contract that allows the AIRS software and one notebook computer (or the monetary equivalent) to go to every CAC office
- Collect sign-off sheets from each county as installation and training are completed
- Pay Statewide Soft invoices (or forward as needed) after each county on that invoice has the program installed, training completed, received the notebook computer and completed and submitted a sign-off sheet to that effect
- Initial survey of CACs and report to CACASA at the 2006 Winter Conference
- Secondary survey of CACs and report to CACASA at Interim